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June 17, 2019

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29211

**Re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Each Electrical Utility's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended); Docket No. 2019-176-E; Docket No. 2019-184-E (Dominion Energy South Carolina, Inc.)**

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC"), I am writing to respectfully request that the Public Service Commission of South Carolina ("Commission") administratively close Docket No. 2019-176-E, which was opened on May 23, 2019.

By way of background, DESC understands that Commission Staff initiated Docket No. 2019-176-E in response to the requirements of 2019 Act No. 62 that the Commission "establish each electrical utility's standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary" ("the PURPA Implementation and Administrative Provisions"). S.C. Code Ann. § 58-41-20(A). At its May 29, 2019 Business Meeting, however, the Commission approved a motion directing the Commission Staff to initiate separate proceedings for each electrical utility in order to address the PURPA Implementation and Administrative Provisions for each individual utility. Thereafter, the Commission opened dockets for each of the electrical utilities, including Docket No. 2019-184-E for the purpose of establishing the PURPA Implementation and Administrative Provisions for DESC.

(Continued . . .)

DESC submits that holding a proceeding to establish the PURPA Implementation and Administrative Provisions for each electrical utility is both warranted and required by 2019 Act No. 62. The plain language of S.C. Code Ann. § 58-41-20(A) provides that the Commission “shall open a docket for the purpose of establishing **each electrical utility’s** standard offer, avoided cost methodologies, form contract power purchase agreements, **commitment** to sell forms, and any other terms or conditions necessary to implement” the requirements of this section. (Emphasis added). Similarly, the Commission is required, within six months after the effective date of 2019 Act No. 62, to approve “**each electrical utility’s** standard offer, avoided cost methodologies, form contract power purchase agreements, **commitment** to sell forms, and any other terms or conditions necessary to implement” the requirements of this section. *Id.* (emphasis added). DESC therefore asserts the Commission properly recognized that 2019 Act No. 62 requires these issues to be separately considered for each electrical utility, as opposed to a single, generic docket.

Contrary to the positions advanced by certain parties during the Advisory Committee meeting held on June 14, 2019, DESC also submits that considering the PURPA Implementation and Administrative Provisions in a single proceeding for all electrical utilities would not advance administrative economy or simplify the Commission’s consideration of these matters. Many issues pertaining to avoided costs and the underlying methodologies are unique to each electrical utility and can vary significantly due to differences in the number and type of customers, energy and demand needs and forecasts, generation characteristics, and a number of other factors. Attempting to analyze and study these issues for all electrical utilities therefore would only create confusion and unduly burden the limited administrative resources of the Commission, the electrical utilities, and the other interested parties.

For these reasons, and to avoid further confusion and the potential for duplicative efforts, DESC therefore respectfully requests that the Commission administratively close Docket No. 2019-176-E and clarify that any further filings pertaining to the PURPA Implementation and Administrative Provisions for DESC be addressed in Docket No. 2019-184-E.

Thank you for your consideration of this matter. If you have any questions or need anything further, please do not hesitate to contact me.

Very truly yours,  
  
K. Chad Burgess

KCB/kms

cc:	Dawn Hipp	James Goldin, Esquire
	Jeffrey M. Nelson, Esquire	Richard L. Whitt, Esquire
	Carri Grube-Lybarker, Esquire	Becky Dover, Esquire
	(all via electronic mail and U.S. First Class Mail)	